

FCC WT Docket No.98-143
Comments of Robert E. Rightmire, WA7YNU

RECEIVED
DEC 1 1998
FCC MAIL ROOM

COMMENTS OF:

I, Robert E. Rightmire, WA7YNU, 2023 13th Street West, Billings, Montana, 59102, file these comments on November 25, 1998, in the FCC's Notice of Proposed Rulemaking, WT Docket No. 98-143.

I was first licensed as a Novice in 1974 and I am now licensed as an Amateur Extra. I have held the following licenses: Novice (1.5 years), Technician (6 months), General (20 years), Advanced (4 months) and Amateur Extra (2.5 years). I am a member of the Amateur Radio Relay League (ARRL). I am an active ARRL Extra Class Accredited Volunteer Examiner. I have recruited, organized, led, and participated in more than 50 public service events. I have participated in 10 ARRL Field Day events. I use 75 meters SSB daily when I am home. I use 2 meters and 440 mhz at home and while I travel. I use hf Morse code when my schedule permits.

I have a bachelors degree in History and Business Administration. I am a U.S. Army veteran of the Vietnam Era. I have worked for the State of Montana Department of Labor and Industry, Job Service Division for 25 years as employment interviewer, employer visitor, unemployment claims taker, staff supervisor, and job training supervisor. For the last two years, I have been an Information Systems (computer) Support Specialist. As part of a team, I install, service and support 300+ Windows95 workstations attached to 24 Local Area Novell 4.11 file server Networks which are attached to a Statewide TCP/IP Wide Area Network using 1.5 Mhz T1 lines.

During 1998, I worked with the City Council of Billings and the Billings City-County

FCC WT Docket No.98-143
Comments of Robert E. Rightmire, WA7YNU

RECEIVED
DEC 1 1998
FCC MAIL ROOM

Planning Department to draft antenna height standards for Billings and Yellowstone county.

I am an active member and former officer of the Yellowstone Radio Club. In 1989, I received the (YRC) Ham of the Year award.

In 1997, two Amateurs and I taught a six week technician license class to National Weather Service staff to develop a Amateur Radio weather watch network. Of the twelve attending, eleven passed their exam on the first try and all were licensed.

In general, I support the comments and license structure by the ARRL Directors. However, I have added additional comments on Notice of Proposed Rule Making WT Docket No.98-143 after the paragraph number on the NPRM:

I. INTRODUCTION

1. No Comment Requested
2. No Comment Requested

II. EXECUTIVE SUMMARY

3. No Comment Requested
4. No Comment Requested
5. No Comment Requested
6. No Comment Requested

III. BACKGROUND

7. No Comment Requested
8. No Comment Requested
9. No Comment Requested
10. No Comment Requested

RECEIVED
DEC 1 1998
FCC MAIL ROOM

IV. DISCUSSION

IV.A. Number of License Classes:

11. *"...While we continue to believe there should be a number of license classes sufficient to encourage amateur operators to advance their skills in meaningful ways, six classes of operator licenses may be unnecessary...."*

COMMENT: I support four licenses Technician (ARRL Class D), General (ARRL Class C), Advanced (ARRL Class B) and Amateur Extra (ARRL Class A). I oppose the proposal for three licenses (Technician, General, and Amateur Extra). The math and abstract circuit theory in the Advanced Class test is not measured elsewhere.

12. *"...No new Novice Class licenses would be granted, but anyone currently holding licenses would be permitted to modify or renew their licenses. In addition, Novice Class operators would be eligible for examination credit for the telegraphy requirements for any license class. We seek comment on this proposal."*

COMMENT: I disagree that "...anyone currently holding licenses would be permitted to modify or renew their licenses." Set a short period of time to upgrade as follows:

- (1). Do not renew. All Novice licenses expire ten years from date of issue or most recent renewal.
- (2). Set an expiration date for Novice licenses three years from when these changes go into effect.

I agree that Novice License holders be given examination credit for testing elements for upgraded licenses.

"...We also seek comment on disposition of the designated Novice bands. Currently, other class licensees can operate within the Novice bands, but only at reduced power. Given the small

RECEIVED
DEC 1 1998
FCC MAIL ROOM

number of new Novice licenses now being issues, if we were to discontinue licensing new Novices, would it be appropriate to delete the frequency limitation on Novices and the power limitation on other classes of operators using the Novice frequencies, so that Novices could continue to be limited to 200 watts output power but could operate using the Morse code anywhere within the 80, 40, 15, and 10 meter bands?"

COMMENT:I support removing power limitations for General, Advanced and Amateur Extra operators in Novice bands be removed.

COMMENT:I support the proposal that Novice operators operate at 200 watts or less in the cw portions of the 80, 40 and 15 meter Amateur bands and operate on voice and cw in 10 meter band.

COMMENT:Phone, cw and image should be used in the Novice frequency band segments.

13. *"...We therefore propose that the Technician Plus Class be phased out...."*

COMMENT:I support the proposal that all Technician Plus license holders be rolled back to Technician license. Experienced Technician Plus license holders should be upgraded to General.

"... Holders of an FCC-issued Technician Class operator license granted before March 21, 1987, have previously passed the written examination required to qualify for a General Class operator license...."

COMMENT:I propose that Technician license holders who were licensed before March 21, 1987 be treated as though they held a CSCE for the written Element 3B. They should be given one year from the date of these changes to complete the requirements for the General license.

"...Other Technician Class operators could qualify for a General Class operator license by passing written examination Element 3(B) which consists of thirty questions on the additional privileges of a General Class operator license and the 13 or 20 wpm telegraphy examination. We seek comments on this proposal."

COMMENT:I support this.

RECEIVED
DEC 1 1998
FCC MAIL ROOM

IV.B. Greater Volunteer Examiner Opportunities

14. *"(RM9148) ...We agree, therefore propose to authorize Advanced Class operators to prepare and administer examinations for the General Class operator license...."*

COMMENT:(RM-9148) I agree.

"...In addition, on our own motion, we propose to permit General Class operator licensees to prepare and administer examinations for Technician Class operator licenses. In all cases, examiners will be administering only elements which they themselves have received credit for... We seek comment on these proposals."

COMMENT:I support this. Unless care is taken, forms could be signed by unqualified examiners and advanced for processing. These error could delay the a license or upgrade while the error is corrected.

IV.C. RACES Station Licenses

15. No Comment Requested

16. *"We propose to phase out RACES licenses by not renewing them...."*

COMMENT:Do it now. RACES licenses not be issued or renewed. Set a time frame -- 2 years from the effective date of these changes.

IV.D. Privatization of Certain Enforcement Procedures

17. (RM-9150) No comment.

18. No comment.

IV.E. Telegraphy Examination Requirements

19. No comment requested.

RECEIVED
DEC 1 1998
FCC MAIL ROOM

FCC WT Docket No.98-143
Comments of Robert E. Rightmire, WA7YNU

- 20. No comment requested.
- 21. No comment requested.
- 22. No comment requested.
- 23. No comment requested.

24. *"In view of changes in the technologies that amateurs use to communicate generally, and views with regard to the Morse code requirements specifically, we seek comment on all aspects of the Morse code standards used in our examinations..."*

COMMENT:I enjoy Morse code. I wish my schedule would allow me to spend more time doing it. I passed my five words per minute before another amateur as a Novice. I passed thirteen words per minute before an FCC examiner after two tries. I passed twenty words per minute after several tries. It is a wonderful feeling to pass a Morse Code test at any speed. Morse code is not easy.

Because we test Morse code proficiency for people with disabilities at five words per minute, we have defined the standard. The standard is five words per minute for five minutes which is "accommodated". Proficiency skill at thirteen words per minute or twenty words per minute is "accommodated" by a tested code proficiency of five words per minute.

The purpose of an "accommodation" for a person with a disability under the Americans with Disabilities Act is make the skill or task reachable. The purpose of ADA was not to set two standards -- one for people with disabilities and one for people without disabilities. Legally, I think we are obligated under the Americans with Disabilities Act to set Morse code proficiency at five words per minute in all license classes and all groups unless we can define a compelling reason for this speed to be higher. The ADA affects more than persons with disabilities. A

RECEIVED
DEC 1 1998
FCC MAIL ROOM

government licensing agency has a responsibility to INSURE MINIMUM SAFE STANDARDS; when the licensing process allows five words per minute to become the minimum allowable standard, it defines safe competency. The "consequences of error" of someone who cannot send faster is not serious and it is not a safety hazard to the amateur or others.

Once an amateur is licensed, he/she can use a telegraph key and operate in any part of the cw band which is covered by the license. The FCC license does not "restrict" or "endorse" his/her privileges to use Morse code even in the Amateur Extra segments of the HF bands. The quality of the code does not seem to be important. The speed at which the code is sent on the air does not seem to be important. The "consequences of error" are low.

"...Do the three levels of 5, 13, and 20 wpm remain relevant to today's communications practices? Should we continue to have three different levels, or should these be reduced to one or two -- and, if so, what should be the required speeds?"

COMMENT:No the three levels of code are not relevant to today's communications practices. Three levels of code are needed to define steps in learning and accomplishment rather than actual use on the air. In practice, a code speed over 20 words per minute is the standard on the air but not on the test. The practice of licensing (occupational, vehicle operation, medical, etc.) is a government responsibility to INSURE MINIMUM SAFE STANDARDS. Associations such as ARRL, W5YI, FISTS, etc. should be responsible for the growth in the ART, the PRACTICE and the PROFICIENCY of Morse code. Code Proficiency transmissions and certification by the ARRL is an excellent example. Perhaps there should be a system of continuing education credits established to affect a license or to upgrade a license. To facilitate the use of slow code by the few

RECEIVED
DEC 1 1998
FCC MAIL ROOM

who use it, I suggest a frequency (not a band of frequencies) be defined in a non-regulatory "band plan" for slow speed code.

"...Were we to reduce the required Morse code elements, should we add elements to the written examination to ensure a working knowledge of the newer digital technologies which in part, are replacing the Morse code?"

COMMENT:The difficulty of written tests or content should not be based on changes in the Morse Code test. These should be treated as two different independent elements. What does a Amateur Radio Operator need to know in 1998 to be competent and safe. That is what should be tested.

"...should we consider specifying the method of examining for Morse code proficiency,..."

COMMENT:As a volunteer examiner, I support the current range of options to the VE. However, multiple choice answer sheets are the least effective method of measuring anything. Multiple choice tests are designed for the speed of processing and the convenience of the instructors.

"...We request comment on these and any other issues related to our code speed requirements."

COMMENT:Morse code is a barrier for many upgrades. The Morse Code test has been a public relations disaster for Amateur radio.

25. *"...in RM-9196, the ARRL request amendment of the amateur rules which allow telegraphy examination for credit for the higher telegraphy speeds to examinees with a disability. Specifically the ARRL requests that the examinee be required to attempt the higher-speed telegraphy examination before examination credit is given pursuant to a doctor's certification..."*

COMMENT:Examinees should not be required to attempt and to fail at the higher code speed before being allowed an accommodation. I do not support pursuing more disability information

FCC WT Docket No.98-143
Comments of Robert E. Rightmire, WA7YNU

RECEIVED
DEC 1 1998
FCC MAIL ROOM

at the local level. I agree with the FCC concerns with regard to "unfair burden" and "serious privacy and confidentiality concerns..."

IV.F. Written Examinations

26. COMMENT:As a Volunteer Examiner, I support the "...uniform national database of multiple-choice questions and answers" as "approved by the National Conference of VECs".

27. COMMENT:I would not change the topics on the examinations. In my experience, even examinees with college degrees in physical science and mathematics are challenged by exams.

IV.G. Disposition of Rule Making Petitions

28. No Comment Requested

29. No Comment

30. COMMENT:I oppose the petition for rule change for creation of sub-bands for Technician Plus license holders.

31. No Comment Requested